

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

Civil No. 18-cv-1776 (JRT/HB)

**JOINT UPDATE LETTER**

This Document Relates To:

ALL ACTIONS

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615, Plaintiffs and Defendant Triumph Inc., (“Triumph”) hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms. The Parties have had a number of substantive discussions regarding the search terms that will be used by Triumph. The Parties have made significant progress, but a small number of current disputes still remain. Plaintiffs and Triumph have not yet exhausted the meet-and-confer process; and Plaintiffs and Triumph believe that they will be able to resolve or narrow the current disputes regarding the document search methodology and search terms if given more time to meet and confer.

Plaintiffs and Triumph will work diligently to complete the meet-and-confer process relating to the Triumph document search methodology and search terms by February 5, 2021. The Parties shall submit a joint status letter by February 5, 2021 regarding any disputes on document search methodology and search terms that still remain at that point.

/s/ Bobby Pouya

Bobby Pouya (Pro Hac Vice)  
Clifford H. Pearson (Pro Hac Vice)  
Daniel L. Warshaw (Pro Hac Vice)  
Michael H. Pearson (Pro Hac Vice)  
PEARSON SIMON & WARSHAW, LLP  
15165 Ventura Boulevard, Suite 400  
Sherman Oaks, CA 92403  
Telephone: (818) 788-8300  
Facsimile: (818) 788-8104  
cperson@pswlaw.com  
dwarshaw@pswlaw.com  
bpouya@pswlaw.com  
mperson@pswlaw.com

Melissa S. Weiner (MN #0387900)  
Joseph C. Bourne (MN #0389922)  
PEARSON, SIMON & WARSHAW, LLP  
800 LaSalle Avenue, Suite 2150  
Minneapolis, MN 55402  
Telephone: (612) 389-0600  
Facsimile: (612) 389-0610  
mweiner@pswlaw.com  
jbourn@pswlaw.com

Bruce L. Simon  
PEARSON, SIMON & WARSHAW, LLP  
350 Sansome Street, Suite 680  
San Francisco, CA 94104  
Telephone: (415) 433-9000  
Facsimile: (415) 433-9008  
bsimon@pswlaw.com

/s/ Arielle S. Wagner

Arielle S. Wagner (MN #0398332)  
W. Joseph Bruckner (MN #0147758)  
Brian D. Clark (MN #0390069)  
Craig S. Davis (MN #0148192)  
Simeon A. Morbey (MN #0391338)  
Stephen M. Owen (MN # 0399370)  
Stephanie A. Chen (MN #0400032)  
LOCKRIDGE GRINDAL NAUEN P.L.L.P.  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612) 339-6900  
Facsimile: (612) 339-0981  
aswagner@locklaw.com  
wjbruckner@locklaw.com  
csdavis@locklaw.com  
bdclark@locklaw.com  
samorbey@locklaw.com  
smowen@locklaw.com  
sachen@locklaw.com

*Co-Lead Class Counsel for Direct Purchaser  
Plaintiffs*

/s/ Shana E. Scarlett

Shana E. Scarlett  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
shanas@hbsslaw.com

Steve. W. Berman  
Breanna Van Engelen  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 2nd Avenue, Suite 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
breannav@hbsslaw.com

/s/ Daniel E. Gustafson

Daniel E. Gustafson (#202241)  
Daniel C. Hedlund (#258337)  
Michelle J. Looby (#388166)  
Britany N. Resch (#0397656)  
GUSTAFSON GLUEK PLLC  
120 South 6th Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-8844  
Facsimile: (612) 339-6622  
dgustafson@gustafsongluek.com  
dhedlund@gustafsongluek.com  
mlooby@gustafsongluek.com  
bresch@gustafsongluek.com

*Co-Lead Counsel for Consumer Indirect  
Purchaser Plaintiffs*

/s/ Shawn M. Raiter

Shawn M. Raiter (MN# 240424)  
LARSON • KING, LLP  
2800 Wells Fargo Place  
30 East Seventh Street  
St. Paul, MN 55101  
Telephone: (651) 312-6518  
sraiter@larsonking.com

Jonathan W. Cuneo  
Joel Davidow  
Blaine Finley  
Yifei "Evelyn" Li  
CUNEO GILBERT & LADUCA, LLP  
4725 Wisconsin Avenue NW, Suite 200  
Washington, DC 20016  
Telephone: (202) 789-3960  
jonc@cuneolaw.com  
joel@cuneolaw.com  
bfinley@cuneolaw.com  
evelyn@cunelolaw.com

*Co-Lead Counsel for Commercial and  
Institutional Indirect Purchaser Plaintiffs*

/s/ Aaron Chapin

Gene Summerlin (*pro hac vice*)

Aaron Chapin (#06292540)

Marnie Jensen (*pro hac vice*)

Ryann Glenn (*pro hac vice*)

Kamron Hasan (*pro hac vice*)

Sierra Faler (*pro hac vice*)

HUSCH BLACKWELL LLP

13330 California St., Suite 200

Omaha, NE 68154

(402) 964-5000

gene.summerlin@huschblackwell.com

marnie.jensen@huschblackwell.com

ryann.glenn@huschblackwell.com

kamron.hasan@huschblackwell.com

sierra.faler@huschblackwell.com

*Counsel for Triumph Foods, LLC*